

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

DRI-DESIGN, LLC,

Plaintiff,

vs.

BAMCO, INC.,

Defendant.

Case No.

Hon.

COMPLAINT AND JURY DEMAND

James Moskal (P41885)
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Attorney for Plaintiff
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Plaintiff complains against defendant as follows:

1. This is an action for patent infringement under Title 35 of the United States Code as to which this Court has jurisdiction pursuant to 28 U.S.C. § 1338. Venue lies under 28 U.S.C. § 1400.

2. Plaintiff is a Michigan limited liability company based in Holland, Michigan. Defendant is a New Jersey corporation.

3. United States Patent No. 6,694,694 (copy attached as Exhibit A) was duly issued on February 24, 2004. Plaintiff is the owner of the patent by assignment.

4. Defendant has infringed the patent by making, selling, using or offering to sell panels that embody the patented invention.

5. Plaintiff has complied with the statutory requirement of placing a notice of the patent on the panels that plaintiff sells.

WHEREFORE, plaintiff requests that the Court award plaintiff damages, an injunction, interest, costs and attorney fees, and all additional relief to which plaintiff is entitled.

JURY DEMAND

Plaintiff demands a trial by jury.

WARNER NORCROSS & JUDD LLP

Dated: November 11, 2011

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